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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Biennial Regulatory Review -)
Amendment of Parts 0, 1, 13, 22,)
24, 26, 27, 80, 87, 90, 95, 97, and)
101 of the Commission's Rules to)
Facilitate the Development and Use)
of the Universal Licensing System)
in the Wireless Telecommunications)
Services.)

WT Docket No. 98-20

To: The Commission

Comments of Century Telephone Enterprises, Inc.

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Summary

The Commission's overhaul of its wireless databases into a consistent platform will provide the Commission with a means to efficiently utilize its limited personal resources for the foreseeable future. However, as a licensee in the various commercial and non-commercial wireless services, CenturyTel is concerned that certain aspects of the Commission's proposal will place undue burdens on the industry.

While CenturyTel supports the implementation of electronic filing, it nonetheless urges the Commission to retain a paper filing option for the foreseeable future, until the electronic filing method is perfected and there is 100 percent certainty of recovering any lost data without placing additional burdens on the industry. CenturyTel notes that technological advances will continue to occur, as is evident from the impending release of Microsoft's Windows 98, for which there is no guaranty of compatibility with ULS. Further, many computer systems are local area network (LAN) based, and as such, these work stations may not have the capability to communicate with ULS without the use of a dedicated phone line and modem. Because of these issues regarding hardware compatibility and recent circumstances experienced by the Commission in updating its Common Carrier Land Mobile Database, and involving the use of the Universal Licensing System (ULS) in the 800 MHz SMR and LMDS auctions, CenturyTel urges the Commission to give careful consideration to the wisdom of implementing electronic filing without preserving a paper-filing option.

CenturyTel supports electronic filing as an option for the filing of pleadings. However, because pleadings may include documentary exhibits and attachments, some of which may require signatures under penalty of perjury (as in Petitions to Deny), specialized digital imaging equipment would be required to convert the paper document to a computer file. Such equipment is very expensive and beyond the reach of most small and medium-sized companies. CenturyTel recommends that the Commission continue to accept pleadings

on paper until these issues are resolved and the necessary equipment is available at reasonable cost to the public.

Preview copies of electronic filings are important for any applicant or licensee that utilizes telecommunications departments, engineering consultants, and/or outside counsel for the preparation of FCC filings. Since these filings are prepared on the basis of information provided to the preparer, it is vitally important that such filings be reviewed for accuracy by the applicant, and if in order, dated and signed. With the applicant's approval (as evidenced by the signature on the preview copy), the preparer could then insert the name of the individual who signed the preview copy of the filing, and file it electronically with the Commission. Without this capability for all types of electronic filings, there is no effective way for the preparer of a filing to ensure that the applicant has approved what is to be filed electronically.

CenturyTel supports the use of paper, in addition to electronic mail, as the means for official correspondence. While CenturyTel notes that electronic mail can be very convenient, there is no certainty that the electronic mail message will be timely received and acted upon, especially if the intended recipient is out of the office on leave, travel, or otherwise not available. Additionally, CenturyTel supports the proposed conversion of geographic coordinates from NAD27 to NAD83.

CenturyTel recommends that the Commission retain its service specific rules which distinguish the private radio services from the commercial mobile radio services. The private services have enjoyed streamlined processing which should be continued, as well as certain procedures, including: 60-day return cycle for applications, license reinstatement and no ownership reporting requirements. These procedures take into account that private radio licensees are not immersed in the FCC's rules and regulations since these licensees' primary business is not radio.

Finally, the Commission should clarify that licensees which do not implement modifications continue to have a license to operate their underlying facilities, and that any subsequent "reverse" application which may be required is merely ministerial in nature, and will not result in the loss of primary licensing status or other rights that the licensee enjoyed prior to the grant of its proposed license modification.

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To: The Commission

Comments of Century Telephone Enterprises, Inc.

Century Telephone Enterprises, Inc. (CenturyTel), by its attorneys and pursuant to Section 1.415(a) of the Commission's Rules, hereby submits its comments in the above captioned proceeding.

Interest Of CenturyTel

CenturyTel applauds the Commission's efforts to make its application processing more efficient so that applicants will be able receive more timely grants of their applications, and will have greater access to licensing information at a reduced cost. CenturyTel believes that the Universal Licensing System (ULS) will provide the Commission with the first major overhaul of all its wireless databases into a consistent platform that will efficiently utilize the Commission's limited personnel resources for the foreseeable future. However, as a provider of paging, cellular telephone and other commercial mobile radio services, as well as an internal user of private radio, CenturyTel is concerned that certain aspects of the Commission's proposal will place undue burdens on CenturyTel and other licensees in the wireless services.

CenturyTel is a publicly traded company which owns and operates numerous rural and suburban telephone companies. In addition to providing local exchange telephone service over 1.2 million access lines in 21 states, CenturyTel provides integrated

communications services, including advanced wireless services, long distance services, internet access, and security services. CenturyTel, through its operating subsidiaries, holds numerous radio licenses in the Part 22 Public Land Mobile, Part 90 Private Land Mobile, and Part 101 fixed microwave services.

The Right To Make Paper Filings Should Be Retained

CenturyTel is concerned that if paper filings are abandoned prematurely, electronic filings may not be sufficient to preserve rights of applicants and third parties. While CenturyTel supports the concept of electronic filing, it nonetheless urges the Commission to retain a paper filing option for the foreseeable future. Electronic filing in ULS is not yet perfected, and there is not yet 100 percent certainty that any lost data can be easily and accurately recaptured by the Commission without placing additional burdens on the public. CenturyTel anticipates that any application which is filed electronically could ultimately be lost forever if the Commission's ULS license database becomes corrupted. Such corruption could occur either through hardware failure, programming errors, hacking, or a future conversion to a new computer system when the current software or hardware for ULS becomes obsolete and is ultimately replaced. For example, CenturyTel notes that the Commission has previously experienced serious computer problems in connection with its Public Land Mobile license database which resulted in the loss of technical data. This data had to be reconstructed through the industry's tedious location and resubmission of engineering from paper copies of old applications that may no longer have existed if the applications had been electronically filed. Additionally, CenturyTel understands that the Wireless Telecommunications Bureau's Microwave Section has been unable to issue instruments of authority for license transfers and assignments due to a malfunctioning computer system. Careful consideration should be given to the wisdom of implementing electronic filing without preserving a paper-filing option under these circumstances.

Other examples of CenturyTel's concerns can be given. There have been problems with the Commission's electronic short-form auction application software, as well as issues with respect to using ULS to complete the long-form applications for the 800 MHz SMR and LMDS auctions. From these experiences, it appears, at the outset, electronic filing is fraught with technological issues. Additionally, merely to access ULS, it appears that substantial financial burdens may be imposed on both large and small companies alike in order to maintain the most current computer technology necessary to ensure compatibility with the current version of the ULS system. In this regard, it appears that only certain versions of Netscape and Microsoft's Internet Explorer are fully compatible with ULS, as it was designed for the LMDS auction.¹ Further technological advances will continue to occur at an increasing rate. For example, ULS has apparently not yet been tested with Microsoft's Windows 98 (which is tentatively scheduled for final release in June, 1998). This operating system will be installed on most computers manufactured after July 1, 1998; it is thus uncertain that these new computers will be compatible with the Commission's ULS software.

Additionally, there are issues regarding the capability of computers operating on a local area network (LAN) to dial into the Commission's wide-area network. The computer systems of most medium and large businesses computer systems are LAN based. As such, these, work stations may not be able to communicate with ULS without the use of a dedicated modem and telephone line for each computer work station that would be used to prepare and make FCC filings. This additional cost to do so could be substantial for most applicants and licensees.

As a by-product of mandatory electronic filings, CenturyTel is concerned that applicants and licensees may not be able to obtain a complete proof of filing copy of their

¹ The use of earlier versions of Microsoft's Internet Explorer provided applicants with the mistaken impression that long-form auction applications (FCC Form 601 and attached exhibits) had been successfully submitted to the Commission electronically, when in point of fact only the Form 601 application was transmitted.

applications or other filings. In the event that the data file containing electronic filings is corrupted, then the Commission will not accept a paper proof of filing copy as evidence of timely electronic filing. CenturyTel has learned that during the submission period for the short-form applications in the 800 MHz SMR auction, applicants experienced problems transmitting their attached exhibits. Even though the exhibits had purportedly been properly formatted as ASCII text files and submitted (as evidenced by the proof-of-filing copy provided by the Commission's electronic application software), the Commission treated the applications as incomplete.² The Commission's staff declined to accept the proof-of-filing copies of the applications as evidence of timely submission. Instead, the Commission's staff required the applicants to resubmit their applications electronically even though there was no guarantee that the applicants would not experience the same problem with the Commission's application software.

Electronic Filing Of Pleadings and Other Documents Should Be Implemented On An Optional Basis

The Commission has proposed that pleadings associated with applications be filed electronically. CenturyTel supports electronic filing as an option, but believes that the capability to make paper filings should be retained. CenturyTel is concerned that electronic filing will not be practicable for pleadings that require other documents as exhibits or statements under penalty of perjury. CenturyTel notes that most small and medium-sized businesses are not be able to afford the necessary equipment to submit legible digital copies of documents. Such documents are often required as exhibits prior to filing. Additionally, where a filer does not have access to such digital-imaging hardware, CenturyTel is uncertain as to how such a certification made by the proponent's principal would be signed (e.g., as in Petitions to Deny). Until these issues are resolved and the equipment is readily available to

² It appears that an intermittent software glitch prevented the Commission's computer system from recognizing certain ASCII text files with a file extension other than .TXT. This slight change, in an otherwise correctly formatted application could have prevented a qualified applicant from participating in the auction.

the public at reasonable cost, the Commission should continue to accept pleadings on paper, in accordance with its current rules.

Transactional Applications Should Be Expedited

CenturyTel supports the use of ULS for the filing and processing of license assignment and transfer of control applications. It is important that such transactional applications be processed separately from facilities applications. ULS should be able to distinguish properly between transactional applications and facilities applications. Accomplishing such result will permit such transactions to be promptly listed on public notice as accepted for filing (where required) and processed to grant without delay, CenturyTel believes that the ability of the business community to implement beneficial business arrangements in a timely fashion will thereby be greatly enhanced.

ULS Should Allow Preview Copies Of Electronic Filings

Many wireless licensees like CenturyTel utilize telecommunications departments, engineering consultants and/or outside counsel to prepare filings with the FCC based upon information provided by the filer. Therefore, it is essential that ULS have the capability of permitting the preparer to obtain a "preview copy" of the filing prior to making the actual filing itself. In this way, the accuracy of the proposed filing can then be reviewed by the applicant, and if in order, dated and signed. With the applicant's approval (as evidenced by the signature and date of an officer or authorized employee of the filer), the preparer could then properly insert the name of the individual who signed the preview copy of the filing, and file it electronically with the Commission, with knowledge that the electronic filing of the application has been authorized by the applicant. Without the ability to print a preview copy of the application (which option was available with the Commission's Form 175 electronic software, but not with the ULS auction long-form applications), there is no

effective way for the preparer of a filing to ensure that what the applicant has approved is precisely what is filed electronically.³

Official Notices Should Be Sent By Paper

CenturyTel supports the use of paper, in addition to the use of electronic mail, as the means for official correspondence between the FCC and its licensees and applicants. While CenturyTel acknowledges that E-Mail can be convenient and efficient for certain purposes, CenturyTel is nonetheless concerned that an E-Mail message may not be delivered or deliverable due to incompatibilities with the FCC's internet service provider and its computer system. CenturyTel and others have experienced circumstances where it appeared that an E-Mail had been delivered, only to discover that the intended recipient did not receive the E-Mail message for what ever reason. There is no certainty that the recipient will be aware of the message when he logs onto his computer. This is true even if the E-Mail message is successfully delivered into the intended recipient's box, unless the intended recipient affirmatively goes out to the internet to retrieve any messages. Further, if the intended recipient is not available (e.g., due to vacation, sickness, travel, or otherwise), no other individual would be aware of the existence of the E-Mail message, since most internet/E-Mail accounts are password-protected. In this regard, the employee responsible for FCC filings may leave the Company or be reassigned to other duties, and valuable rights of a licensee may be lost because the successor may not have learned about FCC requirements and realized that the FCC E-mails must be re-routed. For these reasons, CenturyTel urges the Commission to continue the practice of using the United States Postal

³ In the case of the long-form applications filed electronically in the LMDS auction, it was necessary to prepare a paper version of the application which included the exhibits, and once signed by the applicant, re-enter the data on the Form 601 into the ULS system. CenturyTel has just seen a demonstration of ULS which did include a print preview function. CenturyTel urges the Commission to make this function permanent as soon as possible.

Service or other reliable delivery service for official correspondence. Telecopier and E-mail would be acceptable as a backup.

Confidential Electronic Filings Must Be Protected

As proposed, the Commission's ULS application forms provide for the protection of confidential information. Applicants for FCC radio licenses in the broadband personal communications service have been victimized by the Commission's previous release of confidential information over the internet in connection with their auction applications. As a result, CenturyTel is deeply concerned that ULS may not provide adequate protections to prevent an inadvertent disclosure of confidential information to unauthorized FCC personnel or to the public. In order to allay any fears of an inadvertent compromise, CenturyTel urges the Commission to disclose its procedures to protect such information.

CenturyTel Supports The Conversion To NAD83

CenturyTel supports the FCC's proposal to require that geographic coordinates be given in NAD83, rather than NAD27. However, in order to facilitate a smooth transition, CenturyTel urges the Commission to convert all coordinates in its license database to NAD83, much like it did when it made the conversion from feet and inches to meters, and then indicate on the face of the authorization that all coordinates are shown in NAD83. These precautions should ensure that the data in the Commission's license database and tower database is accurate. CenturyTel also recommends that the Commission adopt a transition period of not less than one year, so that the public will be able to properly transition to NAD83. Further, for any tower registration certificates, CenturyTel recommends that such certificates be issued showing both the NAD27 and NAD83 geographic coordinates. In this way, those licensees with licensing records in NAD27 will be able to (i) verify the accuracy of their information, and (ii) ensure a proper conversion to NAD83 in future filings.

Antenna Data Should Not Be Eliminated

CenturyTel opposes the Commission's proposal to eliminate the requirement for applicants in the Part 22 mobile services to submit make and model number of their antenna. The Commission's theory appears to be that under the new rules for geographic area licensing, such information will be unnecessary, and at first blush, may be a good idea. However, it is not clear that FCC Form 601 will provide enough information for an incumbent licensee on the lower band frequencies to modify its station and be sure that it is fully protected by the co-channel licensee auction winner. Conversely, the reduced antenna information may make it more difficult for the auction winner to ensure that an incumbent co-channel licensee is staying within its authorized contours. In this regard, Schedule J to FCC Form 601 elicits information about the beam width of a directional antenna, as well as effective radiated power (ERP) and height above average terrain (HAAT) along the eight cardinal radials; but only for fixed stations and not base stations.⁴ This information should also be required for base stations.

The Commission Should Not Impose a 30-Day Reporting Deadline For Permissive Modifications

The Commission has proposed to require licensees desiring interference protection for permissive modifications to report such modifications within 30 days of implementation. Currently, licensees are not required to notify the Commission of such modifications, unless they desire interference protection. CenturyTel submits that the Commission's proposed 30-day deadline is unnecessary given that licensees are not permitted to increase their composite interference contour. Rather, if a licensee desires specific protection for a particular facility (as opposed to its composite interference contour) it should be allowed to make the appropriate filing, at its convenience. By imposing a 30-day filing requirement, the

⁴ Under the Commission's current rules, fixed stations refers to transmitters that communicate with other fixed stations, e.g., control stations. Base stations refers to transmitters that communicate with mobile receivers (e.g., cellular telephones, pager receivers, etc.) and fixed stations (e.g., rural subscriber stations).

Commission is adding a trap that, if inadvertently tripped, could result in the loss of interference protection to an otherwise legitimate radio facility that is providing a necessary service to the public. Such a result would be contrary to the public interest. Instead, the Commission should recognize that its licensees are not prejudiced, and its resources are not taxed, by virtue of the fact that a permissive filing is made more than 30 days after the fact.

Service Specific Rules Should Preserve The Streamlined Licensing Process Enjoyed By Private Radio Licensees

The FCC has proposed to streamline its rules by eliminating, where practicable, inconsistent processing rules among the different radio services. While streamlining may be beneficial for certain processing, the result would make licensees in the private radio services (who are not in the business of providing radio services to the public) subject to more rigorous regulation than in the past. For instance, under the FCC's current proposal, it appears that private radio licensees may be required to submit ownership information on an annual basis, which information had previously not been required since foreign ownership restrictions were not implicated in the private mobile services.⁵

It is respectfully submitted that conformity is not an adequate reason to subject private radio users to more strict regulations, at a time when the marketplace dictates fewer regulatory burdens, not more. There are valid reasons why Part 90 internal use licensees have not been subjected to the more onerous burdens placed on commercial service providers: Internal use licensees are generally not in the radio business, but are instead in businesses like manufacturing, delivery, or provision of alarm monitoring and protection services. These entities are not immersed in the FCC licensing processing the same way

⁵ Additionally, CenturyTel notes that the proposed requirement to submit ownership information on an annual basis is even an about face for the common carrier/commercial mobile services, which, for several years, have only been required to file a Form 430 Licensee Qualification Report detailing their ownership in license assignment and transfer of control applications if a current Form 430 report was not already on file. In point of fact, this requirement was eliminated for the Common Carrier Fixed Point-to-Point Microwave Service upon the adoption of Part 101 of the Commission's Rules, effective August 1, 1996.

that commercial licensees are, and often do not have the resources to have separate FCC compliance personnel on staff. Indeed, their licensing work is often handled by the equipment sales representative who sold them their radios. Moreover, these internal users are generally not subject to the foreign ownership restrictions, spectrum caps, and other rules and policies which must be imposed on common carriers in order to protect the public interest. Thus, private users are not "similarly situated" with commercial licensees regulated by the Wireless Telecommunications Bureau.

The Construction Notification Requirement Should Not Be Imposed on Private Users

CenturyTel opposes the FCC's proposal to require licensees in the private land mobile services to file construction completion notifications, at the risk of automatic termination of their authorization. The private land mobile services operate on shared frequencies, rarely causing harmful interference to other licensees. While a construction notification would clear the FCC's license database, private mobile licensees, who are used to the current streamlined processing of receiving an authorization and then building, would be subject to the automatic termination of their authorizations if they inadvertently failed to notify the Commission of the timely construction of their radio facilities. As discussed above, the vast majority of licensees in the private land mobile services are not telecommunications carriers, and radio is only an adjunct to their businesses. Because most private land mobile licensees are not intimately versed in the Commission's requirements, the Commission could expect a flood of reauthorization applications, which would tax the resources of the frequency coordinators and the Commission's staff, as well as drive expenses up for many businesses. Moreover, the safety of the employees and customers of companies like CenturyTel may be jeopardized if operations are interrupted by an inadvertent failure to submit a construction notification.

Reinstatement Rights Should Be Preserved

The FCC has proposed to eliminate the current reinstatement period for licensees in the private land mobile services. CenturyTel opposes this proposal. While the FCC has traditionally notified licensees of their impending license renewals, events occur in the business world which, for whatever reason, prevent the timely filing of the license renewal application, especially because most private radio licensees are not intimately familiar with the FCC's rules and procedures. As such, the FCC should continue its practice of permitting reinstatement applications for the private mobile services, especially since stations in the private land mobile services operate on shared channels, and the likelihood of interference is remote. Balanced against the public interest of continued radio operations, the automatic termination of licenses upon the license expiration date would be a disservice to the public.

The Commission Should Maintain 60 Days For Application Returns

CenturyTel opposes the Commission's proposal to reduce from 60, to 30 days, the time period within which private radio applicants will be able to resubmit applications that have been returned for correction or additional information. CenturyTel notes that in the past several months, the frequency coordinators in the industrial services have been overwhelmed by applications, thereby causing delays of up to several months in obtaining successful frequency coordination. Because of this delay, CenturyTel is concerned that even the most diligent applicant will not be able to resubmit its application to the FCC within the 30-day period proposed by the Commission. The 60-day period currently in use allows for sufficient research and verification of issues so that the application can be appropriately amended and submitted to the frequency coordinator for recoordination for refiling with the FCC. Reducing the period by 30 days will place an undue burden on most private radio licensees, who must rely on outside assistance with respect to their radio systems, thereby

further delaying final approval of their proposal if the application must be filed anew and go back to the rear of the processing line.

Submission Of Ownership Information For The Private Land Mobile Services Is Not Necessary

The FCC has proposed to collect ownership information from all wireless applicants, including applicants in the private land mobile services. CenturyTel believes that this requirement will pose an undue burden on licensees in the private, non-auctionable radio services. Currently, no ownership information is collected from private radio licensees, since such information is not required by the Communications Act, even though the current application form (FCC Form 600) requests certain information of commercial mobile providers. By requiring additional ownership information that is not relevant to the private radio services, the Commission is substantially increasing the regulatory burden on its licensees to provide detailed ownership information that could be several layers deep, as in the case of CenturyTel. Such a requirement would be unwieldy. For these reasons, CenturyTel urges the Commission to retain the status quo with respect to the private, non-auctionable radio services.

There are a number of instances where the same application forms are used by entities with differing disclosure requirements, those entities with a reduced disclosure burden simply need not answer the inapplicable questions. See, e.g., FCC Form 600 Main Form, Items 30, 31, 32, and 33. Thus, there is no need to force additional filing and disclosure burdens on private user licensees, merely for the sake of conformity.

The Implementation Of ULS Should Not Adversely Affect Licensee's Rights

The Commission has proposed to codify its informal policy regarding processing procedures for applications and other filings in the Common Carrier Fixed Point-to-Point Microwave Service (CPPMS). Specifically, the Commission has proposed to conform its rules to its current practice which requires the filing of an application for modification of license to restore an authorization to the status quo ante upon an licensee's determination

that authorized modifications will not be implemented. In this regard, the Commission takes the position that, if an authorized license modification is not implemented, the licensee is left without an authorization of any kind and must reapply for its current license, i.e., the license in existence when the modification was applied for. In effect, the underlying station license would be treated as revoked.

CenturyTel understands that the basis for the Commission's informal policy is the limitations of its CPPMS license database -- specifically, that the underlying licensing data for a particular station is permanently overwritten upon the grant of an application for modification of the license. However, the Commission's informal policy as applied (which it belatedly proposes to codify through notice and comment rulemaking) has the undesirable effect of making the implementation of authorized modifications mandatory by stripping the licensee's authority to continue operations under the station's underlying parameters following the expiration of the authorized construction period.⁶ This result is untenable and impracticable, and would lead to the ridiculous and unjustifiable result that an authorized long-standing CPPMS operation would suddenly become unauthorized, by virtue of a change in business plans or other unforeseen circumstances which make implementation of planned license modifications unnecessary or undesirable. Indeed, a greater injustice could hardly be imagined. The loss of operation authority would be particularly serious where the affected facilities are operating in the 2 GHz band on a primary basis in that most facilities applications for facilities in the 2 GHz band are granted on a secondary basis only.

⁶ Nothing in Rule Sections 101.63, 101.65, and 101.67 (regarding construction periods, forfeiture and termination of station authorizations, and license periods, respectively) supports the conclusion that a licensee forfeits its underlying operating authority by virtue of not implementing authorized license modifications, pursuant to the grant of a conditional license. The conditional license does not mature into a permanent license authorization unless the licensee satisfies the condition -- namely the completion of construction of the authorized modifications and the commencement of operation prior to the expiration of the construction period. And, if, as a result of the non-completion of the modification, the conditional license does not mature into a full license, the licensee's underlying authority (pre-modification) remains.

Moreover, the result that the Commission seeks to bring about is in violation of law and may not be instituted without an amendment to the Communications Act of 1934, as amended (the Act). Section 312 of the Act sets forth the procedure which the Commission must follow before it may revoke a license. Under Section 312, a license may only be revoked for misconduct or other wrongdoing by the licensee and, then, only after the issuance by the Commission of an order to show cause why a revocation order should not be issued giving the licensee the opportunity for a hearing. See Section 312(c) of the Act; Capitol Paging, 73 RR 2d 1381 (1993); David A. Bayer, 71 RR 2d 308 (1992). The Commission's objective of summarily treating a station license as revoked if an authorized license modification is not implemented is simply at odds with the clear letter of the law.

Because of these considerations, CenturyTel urges the Commission to clarify that (i) licensees that do not implement authorized modifications continue to have a license to operate their underlying facilities, as previously authorized; and (ii) any subsequent application that may be required is merely ministerial in nature, and will not result in the loss of any primary licensing status or other rights that the licensee enjoyed prior to the grant of its proposed modification, and does not require any new frequency coordination.

Conclusion

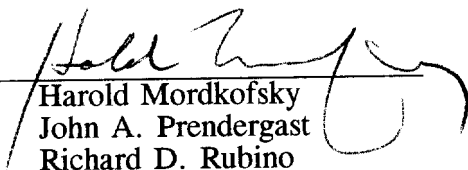
In light of the foregoing, CenturyTel respectfully requests that the Commission: (1) permit continuation of paper filings, (2) ensure that it is possible to make preview copies of electronic filings prior to filing, (3) take affirmative steps to ensure confidentiality of electronic filings, where requested, (4) use paper mailings for official correspondence with licensees, (5) take steps to ensure a smooth transition from NAD27 to NAD83, (6) retain the requirement to provide full antenna information for the Part 22 public mobile services, (7) retain the Commission's current rules regarding the filing of permissive modifications, (8) retain the current private land mobile application return procedures and license reinstatement procedures, (9) dispense with the proposed requirement that private radio applicants provide

detailed ownership information, (10) process transactional applications as rapidly as possible, and (11) clarify that licensee rights will not be adversely affected by the implementation of ULS.

Respectfully submitted,

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